

EXHIBIT C

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION

Case No.
3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

MDL No. 2891

Epic Games Inc. v. Google LLC,
et al.,
Case No. 3:20-cv-05671-JD

In re Google Play Consumer
Antitrust Litigation,
Case No. 3:20-cv-05761-JD

In re Google Play Developer
Antitrust Litigation,
Case No. 3:20-cv-05792-JD

State of Utah, et al.,
v. Google LLC, et al.,
Case No. 3:21-cv-05227-JD

Match Group LLC, et al.,
v. Google LLC, et al.,
Case No. 3:22-cv-02746-JD

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REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF
PURNIMA KOCHIKAR
Wednesday, August 31, 2022

Reported By: Lynne Ledanois, CSR 6811

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1 large developers who are very committed and think we
2 provide a lot of value.

3 Q Were you part of the team that presented
4 Project Hug to the Business Council?

5 A Yes.

6 Q And was that April 9th, 2019?

7 A Yes, around that time.

8 Q And the Business Council subsequently
9 approved Project Hug; right?

10 A Yes.

11 Q And Project Hug was targeted to 22 large
12 game developers at that time?

13 A Yes.

14 Q And the idea that Google had was not to
15 reduce revenue share for those developers because
16 there was a risk that doing so would lead to
17 contagion of other developers asking for similar
18 reductions; right?

19 A We always want to do things equitably. We
20 want to focus on growth first and so we said, take
21 some of this large developers, see how Google can add
22 value, understand where we can take it and then decide
23 where to go with it.

24 Q And one of the ways that Google presented
25 the Hug developers with the value proposition of the

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1 Hug arrangement was to show what their effective
2 revenue share would be below 30 percent; correct?

3 A No.

4 Q You've never seen charts of what the
5 effective revenue share would be for Hug developers
6 with all the benefits across platform, across
7 Google?

8 A We may have internally done it. Whenever we
9 presented to developers, if you use the presentations
10 that I have been part of, we always focused on growth
11 and --

12 Q Sorry, go ahead.

13 A And growth and co-investment.

14 Q And the developers, though, in
15 communicating with Google did talk about and it in
16 terms of effective revenue share; correct?

17 A I can only think of maybe one or two out of
18 the 22.

19 Q ABK is one of them?

20 A ABK did bring it up but then ended up doing
21 massive commits on Cloud and hugely increasing their
22 ads spend, et cetera.

23 They have actually doubled down more than
24 anything else.

25 Q Supercell is another one?

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1 A Supercell didn't accept Hug at all.

2 Q No, but they were a Hug developer
3 targeted; correct?

4 A They were a Hug developer, we had a
5 conversation. Supercell's decision to say no had as
6 much to do with the fact that they had already
7 committed to someone else for Cloud and they didn't
8 see the value.

9 None of this was -- it was all à la carte.
10 People could pick and choose what they wanted and so
11 with Supercell, we needed to think differently about
12 where we could add value for them.

13 Q I'm trying to figure out at the moment --
14 we'll talk about that later.

15 I'm just trying to figure out who were the
16 developers that raised what their effective revenue
17 share would be in the context of the Hug
18 negotiation?

19 ABK was one. Who was the other one that
20 you have in mind?

21 A Supercell.

22 Q Okay. So other than ABK and Supercell,
23 there are no other developers that come to mind that
24 talked about the benefits from a Hug deal in terms
25 of reduction of their revenue share?

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1 A I wasn't in all conversations, I was
2 definitely more in Supercell and ABK that I can
3 recall.

4 But I know there were conversations with
5 my team.

6 Q Okay. So other than ABK and Supercell,
7 are there any other of the 22 Hug negotiations that
8 you would say you were significantly involved in?

9 A No. I -- you know, I would steer the team
10 if they had a question about what to do, but not
11 actively involved in the negotiations.

12 Q So when you were referred to the
13 conversations with the rest of your team who were
14 doing the day-to-day negotiations with the other I
15 guess 20 Hug developers, did you come to understand
16 that any of the other 20 Hug developers were
17 thinking about the value of a Hug deal in terms of
18 reduction of revenue share off of their 30 percent
19 wrap rate?

20 A Probably. But, you know, I want to
21 underscore that the investment commitment was outsized
22 to the credits that it provided.

23 So, for example, you got a dollar worth of
24 ads credits for every three dollars that a developer
25 would spend.

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1 They had to make significant Cloud
2 commits, et cetera, so I don't -- I do want to point
3 that out.

4 Q Is your view that the additional credits
5 and things that you were just referring to were a
6 net negative to the developers?

7 A No, I think it meant that they found that
8 our hypothesis was right. That they could pick and
9 choose the stack that Google can provide and to lean
10 in to grow together.

11 Q The dollars that Google was giving in
12 these credits were cash negative for Google;
13 correct?

14 A The overall -- I don't -- I don't think so.
15 So we have had significant what do you call
16 incremental Cloud commits, for example. It's
17 different PAs. And we need to figure out how to bring
18 that together.

19 Q But when they are brought together
20 internally, what you saw was a reduction in the
21 amount of money that Google Play was getting from
22 these developers in terms of a lower revenue share?

23 A From Play, yes. So not in terms of the
24 lower revenue share. Our service fee is still
25 30 percent.

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1 Google was investing portions of their
2 service fee to help developers grow by bringing the
3 rest of Google together.

4 Q And the way that was presented internally
5 was effective revenue share to Google Play?

6 A Google -- sorry.

7 MS. NARANJO: Objection to form.

8 THE WITNESS: We have to think about how
9 PAs look at their models. So internally we said we
10 could take a portion of the fees to invest to grow.
11 BY MS. MOSKOWITZ:

12 Q So my question was: The way that that was
13 presented internally, and you've seen the charts
14 that show --

15 A Yes.

16 Q -- that this was presented internally as
17 effective revenue share for Google Play?

18 A It was presented as I think reduction in
19 service fee. And so that we -- you know, we always
20 keep track of what the impact is so that if you have
21 to expand, we understand it's equitable.

22 Q Okay. So in terms of reduction in service
23 fee, you've seen charts that show in the order of,
24 you know, 3 to 6 percent, 3 to 5 percent reduction
25 off of the 30 percent for each Hug developer?

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1 A From -- if you take just place LANS but then
2 they had to co-invest to earn it.

3 Q I'm just talking about what you see
4 presented in terms of reduction in revenue share for
5 Google Play.

6 You've seen charts that show between 3 and
7 6 percent for many of the Hug developers off of the
8 30 percent?

9 A Yes.

10 Q Remember Topic 16 was specifically
11 negotiations and communications with Activision.
12 Was there King -- or without Google Play, do you
13 remember that?

14 A Yes.

15 Q Can I ask you what you did to prepare with
16 respect to that topic?

17 A I was very involved.

18 Q So I take that to mean you did not speak
19 to anyone else to prepare?

20 A Yes, I didn't speak to anyone else.

21 Q Did you read Lawrence Koh's deposition
22 transcript?

23 A No. I didn't even know he deposed.

24 Q So I take it that you were not then
25 briefed on what Mr. Koh said during his deposition?